

WILLKIE FARR & GALLAGHER LLP
BENEDICT HUR (SBN 224018)
bhur@willkie.com
SIMONA AGNOLUCCI (SBN 246943)
sagnolucci@willkie.com
EDUARDO SANTACANA (SBN 281668)
esantacana@willkie.com
JOSHUA D. ANDERSON (SBN 312836)
jdanderson@willkie.com
DAVID D. DOAK (SBN 301319)
ddoak@willkie.com
TIFFANY LIN (SBN 321472)
tlin@willkie.com
NAIARA TOKER (SBN 346145)
ntoker@willkie.com
HARRIS MATEEN (SBN 335593)
hmateen@willkie.com
333 Bush Street, 34th Floor
San Francisco, California 94104
Telephone: (415) 858-7400
Facsimile: (415) 858-7599

Attorneys for Defendant
GOOGLE LLC

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA

JOHN DOE I, et al., individually and on
behalf of all others similarly situated,

Plaintiffs,
vs.
GOOGLE LLC,
Defendant.

Case No. 3:23-cv-02431-VC
(Consol. w/ 3:23-cv-02343-VC)

**DECLARATION OF EDUARDO
SANTACANA IN SUPPORT OF
GOOGLE'S ADMINISTRATIVE
MOTION TO SEAL JOINT LETTER
BRIEF RE: PRESERVATION**

Complaint Filed: May 12, 2023

*District Judge Vince Chhabria
San Francisco Courthouse, Ctrm. 4*

I, Eduardo Santacana, declare as follows:

1. I am an attorney licensed to practice in the State of California. I am an attorney with the law firm of Willkie Farr & Gallagher LLP, counsel of record for Google LLC in the above-captioned matter. I have knowledge of the facts set forth below and, if called as a witness in a court of law, could and would testify competently thereto.
2. Attached hereto as **Exhibit 1** is the Order regarding Preservation of Certain Mapping and Linking Tables issued in *Calhoun, et al. v. Google, LLC*, 4:20-cv-05146-YGR-SVK (N.D. Cal.) at Dkt. 1004-4. The highlighted portions of the Order were redacted and filed under seal.
3. Attached hereto as **Exhibit 2** are excerpts from Google's Deep Dive on Google Display Ads Identity and Infrastructure, filed under seal in *Calhoun* at Dkt. 462-40.
4. Attached hereto as **Exhibit 3** are excerpts from Google's Unified Identity Service Design Document, filed under seal in *Calhoun* at Dkt. 462-39.
5. Attached hereto as **Exhibit 4** are excerpts from the Expert Report of Zubair Shafiq in Support of Plaintiffs' Sur-Reply in Further Opposition to Google's Motion for Summary Judgment, filed under seal in *Calhoun* at Dkt. 909-10.
6. Attached hereto as **Exhibit 5** is a transcription, prepared by Plaintiffs' counsel, of a Google Internal Video Presentation filed under seal in *Calhoun* at Dkt. 462-75. The video has also been lodged with the Court.
7. Attached hereto as **Exhibit 6** is the Special Master Preservation Recommendations issued and filed under seal in *Calhoun* at Dkt. 666-2.
8. Attached hereto as **Exhibit 7** is the Declaration of Bryant Chan filed in *Calhoun* at Dkt. 713-8. The highlighted portions of the Declaration were redacted and filed under seal.

9. Attached hereto as **Exhibit 8** is the Order Adopting in Part and Modifying in Part Special Master's May 23, 2022 Report and Recommendation re Preservation Plan issued and filed under seal in *Calhoun* at Dkt. 766.

I declare under penalty of perjury under the laws of the United States that the foregoing is true and correct.

Dated: March 8, 2024

By: /s/ Eduardo Santacana

Eduardo E. Santacana

Attorney for Google LLC